



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

October 25, 2024

BY ECF

The Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Kevin Perez*, 23 Cr. 99 (LJL)

Dear Judge Liman:

In light of the Court's order adjourning trial in this matter to October 4, 2024 (*see* Dkt. No. 136), the parties respectfully propose the following deadlines, which are consistent with the deadlines previously set by this Court (*see* 7/29/24 Dkt. Entry), taking into account the end-of-year Court holidays:

- Government expert disclosures: December 20, 2024
- Requests to charge, motions in limine, and proposed voir dire: December 20, 2024
- Defense expert disclosure deadline: January 3, 2025
- Objections to requests to charge and proposed voir dire, and responses to motions in limine: January 3, 2025
- Final pretrial conference: the parties propose the week of January 13, 2025

The Government further requests that the Court exclude Speedy Trial Act time from November 12, 2024, through January 21, 2025, pursuant to 18 U.S.C. § 3161(h)(7)(A), to accommodate the defendant's request for additional time to prepare for trial. (*See, e.g.*, Dkt. No. 134). The defense does not object to this request.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/
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cc: All counsel of record (by ECF)